

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PERIENNE DE JARAY,

Plaintiff,

V.

ATTORNEY GENERAL OF CANADA
FOR HER MAJESTY THE QUEEN,
CANADIAN BORDER SERVICES
AGENCY, GLOBAL AFFAIRS CANADA
fka DEPARTMENT OF FOREIGN
AFFAIRS AND INTERNATIONAL
TRADE CANADA, GEORGE WEBB,
KEVIN VARGA, and PATRICK LISKA,

Defendants.

No.: 2:16-cv-00571

DECLARATION OF JANIS C.
PURACAL IN SUPPORT OF
PLAINTIFF'S MOTION FOR FRCP 16
STATUS CONFERENCE AND
PERMISSION TO ENGAGE IN
DISCOVERY UNDER FRCP 26(f)

I, Janis C. Puracal, hereby declare as follows:

1. I am an attorney with the law firm of Maloney Lauersdorf Reiner, PC, counsel to Plaintiff Perienne de Jaray in this matter. I have personal knowledge of the following facts gained in my capacity as counsel.

2. I attempted to work with counsel for the Defendants to confer under FRCP 26(f) and was unsuccessful. I also attempted to work with counsel for the Defendants to agree on reasonable limitations for preliminary discovery in advance of the Defendants' anticipated motions to dismiss. Counsel for the

1 Defendants insisted that I outline the discovery I believe is necessary to
2 respond to the motions, but counsel for the Defendants was unwilling to
3 disclose the basis for those motions. I am unable to narrowly tailor discovery
4 to meet the Defendants' motions without knowing the basis for those motions.
5 I believe the parties are at an impasse.

6 3. Attached as Exhibit 1 is a true and correct copy of an email thread
7 between me and David West, beginning on July 29, 2016, with my attempt to
8 confer under FRCP 26(f).

9 I declare under penalty of perjury under the laws of the United States
10 that the foregoing is true and correct to the best of my knowledge, information,
11 and belief.

12 Dated this 11th day of August, 2016.

/s/Janis C. Puracal
Janis C. Puracal, WSBA #39234
E-Mail: jcp@mlrlegaltteam.com